

Honorable Marsha J. Pechman

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AYANNA ROSENBERG, individually, and on
behalf of all those similarly situated,

Plaintiff,

v.

CCS COMMERCIAL, L.L.C., (d/b/a Credit
Collection Services Commercial), and
PROGRESSIVE DIRECT INSURANCE
COMPANY,

Defendants.

Case No. 2:17-cv-00476-MJP

**STIPULATED MOTION AND
[REDACTED] ORDER AMENDING
CASE SCHEDULE FOR SOLE
PURPOSE OF CONTINUING ONE OUT-
OF-STATE 30(B)(6) DEPOSITION OF
PROGRESSIVE**

**NOTE ON MOTION CALENDAR:
MAY 10, 2018**

Pursuant to LCR 7(d)(1), LCR 10(g), and the Court's Chamber Procedures, plaintiff Ayanna Rosenberg, defendants CCS Commercial, LLC ("CCS"), and Progressive Direct Insurance Company ("Progressive"), by and through their counsel, hereby stipulate and move for a three-week continuance of the discovery deadline.

STIPULATED MOTION

The parties agree and stipulate as follows:

The current discovery deadline is May 16, 2018. Plaintiff is scheduled to take a Rule 30(b)(6) deposition of Progressive on May 14, 2018.

STIPULATED MOTION AND [REDACTED] ORDER
AMENDING CASE SCHEDULE FOR SOLE PURPOSE OF
CONTINUING ONE OUT-OF-STATE 30(B)(6)
DEPOSITION OF PROGRESSIVE (2:17-CV-00476-MJP) -
PAGE 1

HOLLAND & KNIGHT LLP
2300 US Bancorp Tower
111 SW Fifth Avenue
Portland, OR 97204
Telephone: 503.243.2300

Based on the parties' schedules and ongoing settlement negotiations, the parties have agreed to postpone the deposition of Progressive. The parties believe that a three-week continuance of the discovery deadline will provide sufficient time for plaintiff to complete the deposition of Progressive without disrupting the remaining case schedule.

Accordingly, the parties agree and stipulate that good cause exists to continue the discovery deadline for three weeks, for the sole purpose of completing the deposition of Progressive, to **June 6, 2018**.

STIPULATED and AGREED:

Dated this 10th day of May, 2018

TOUSLEY BRAIN STEPHENS PLLC

By: /s/ Chase Alvord

Chase Alvord, WSBA No. 26080
Email: calvord@tousley.com
James M. Bulthuis, WSBA No. 44089
Email: JBulthuis@Tousley.com

IDE LAW OFFICE

Matthew James Ide, WSBA No. 26002
Email: mjide@yahoo.com

*Attorney for Plaintiff Ayanna Rosenberg,
individually, and on Behalf of all those
similarly situated*

BULLIVANT HOUSER BAILEY PC

By: /s/ Matthew J. Sekits

Matthew J. Sekits, WSBA #26175
E-mail: matthew.sekits@bullivant.com
Holly D. Brauchli, WSBA #44814
E-mail: holly.brauchli@bullivant.com

*Attorneys for Defendant
CCS Commercial, LLC*

HOLLAND & KNIGHT

By: /s/ J. Matthew Donohue

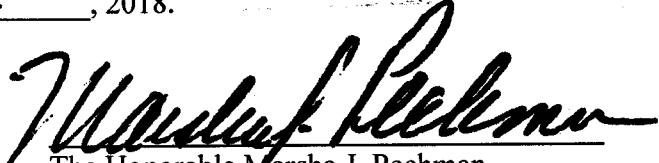
J. Matthew Donohue, WSBA No. 52455
Email: matt.donohue@hklaw.com
Shannon Armstrong, WSBA No. 45947
Email: Shannon.armstrong@hklaw.com

*Attorneys for Defendant Progressive Direct
Insurance Company*

ORDER

Pursuant to the above stipulated motion, and good cause appearing, it is so ordered that the discovery deadline is extended to **June 6, 2018**, for the sole purpose of completing the deposition of Progressive, and that the Case Schedule be amended as indicated.

DATED this 17th day of May, 2018.


The Honorable Marsha J. Pechman
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing STIPULATED MOTION AND [PROPOSED] ORDER AMENDING CASE SCHEDULE FOR SOLE PURPOSE OF CONTINUING ONE OUT-OF-STATE 30(B)(6) DEPOSITION OF PROGRESSIVE to be served on the following person[s]:

Chase Christian Alvord
James M. Bulthuis
Tousley Brain Stephens
1700 Seventh Avenue, Suite 2200
Seattle, WA 98101
Calvord@tousley.com
Jbulthuis@tousley.com

Matthew J. Sekits
Holly D. Brauchli
Bullivant Houser Bailey PC
1700 Seventh Avenue, Ste. 1810
Seattle, WA 98101
matthew.sekits@bullivant.com
holly.brauchli@bullivant.com

Matthew James Ide
Ide Law Office
7900 SE 28th St., Suite 500
Mercer Island, WA 98040
Mjide@yahoo.com

Attorneys for Defendant CCS Commercial LLC

Attorneys for Plaintiff

by causing the document to be delivered by the following indicated method or methods:

☒ by CM/ECF electronically mailed notice from the Court on the date set forth below.

☐ by mailing full, true and correct copies thereof in sealed, first class postage prepaid envelopes, addressed to the parties and/or their attorneys as shown above, to the last-known office addresses of the parties and/or attorneys, and deposited with the United States Postal Service at Portland, Oregon, on the date set forth below.

☐ by causing full, true, and correct copies thereof to be hand-delivered to the parties and/or their attorneys at their last-known office addresses listed above on the date set forth below.

☐ by sending full, true, and correct copies thereof, via overnight courier in sealed, prepaid envelopes, addressed to the parties and/or their attorneys as shown above, to the last-known office addresses of the parties and/or their attorneys, on the date set forth below.

☐ by faxing full, true, and correct copies thereof to the fax machines which are the last-known fax numbers for the parties' and/or attorneys' offices, on the date set forth below.

DATED May 10, 2018.

/s/ Kristin M. Asai
Kristin M. Asai

CERTIFICATE OF SERVICE – PAGE 1

HOLLAND & KNIGHT LLP
2300 US Bancorp Tower
111 SW Fifth Avenue
Portland, OR 97204
Telephone: 503.243.2300